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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

<p>15 Dewann Williams, 16 Plaintiff, 17 v. 18 Santander Consumer USA, Inc., 19 Defendant.</p>	<p>Case No.: 2:18-cv-00679-RFB-GWF JOINT STIPULATION AND ORDER TO EXTEND DISCOVERY (FIRST REQUEST)</p>
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23 Plaintiff Dewann Williams (“Plaintiff”) and Defendants Santander Consumer
24 USA, Inc. (“Defendant”) (jointly as “the Parties”), by and through their counsel of
25 record, do hereby stipulate to modify the Court’s Order, ECF No. 10, to extend
26 (1) the last date to disclose experts from September 5, 2018 to **October 5, 2018**;
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- (2) the last date to disclose rebuttal experts from October 5, 2018 to **November 4, 2018**;
 - (3) the last date to complete discovery from November 4, 2018, to **December 4, 2018**;
 - (4) the last date to file dispositive motions from December 4, 2018, to **January 3, 2019**; and
 - (5) (3) the last date to file the proposed joint pretrial order from January 3, 2018, to **February 5, 2019**.

Pursuant to LR 26-4, good cause exists to amend the Scheduling Order. The Parties have diligently pursued discovery. Plaintiff has propounded written discovery requests and noticed Defendant's deposition. The Parties are meeting and conferring regarding Defendant's discovery responses. This request for extension of deadlines is made specifically in this fee-shifting matter since experts and depositions are a significant expense. The Parties seek additional time to disclose experts until the discovery disputes are resolved and to reschedule Defendant's deposition, because of scheduling conflicts.

Further good cause exists to amend the Scheduling Order to provide additional time to complete ongoing settlement discussions.

Pursuant to LR 26-4(a), Plaintiff propounded written discovery requests upon Defendant and noticed the deposition of Defendant. Defendant served Plaintiffs with objections to Plaintiffs' written discovery requests.

Pursuant to LR 26-4(b), the Parties request additional time to conduct Plaintiffs' deposition of Defendant and to disclose experts.

Pursuant to LR 26-4(c), this request for extension of deadlines is made specifically in this fee-shifting matter since experts and deposition is a significant expense.

Pursuant to LR 26-4(d), the Parties propose the following discovery schedule:

- (1) last date to disclose experts: **October 5, 2018**;

- 1 (2) last date to disclose rebuttal experts: **November 4, 2018**;
2 (3) last date to complete discovery: **December 4, 2018**;
3 (4) last date to file dispositive motions: **January 3, 2019**; and
4 (5) last date to file the proposed joint pretrial order: **February 5, 2019**.

5 For the foregoing reasons, the Parties jointly request that this Court modify its
6 May 31, 2018, Order to provide an additional 30 days to complete discovery, and
7 the in the ordinary course file dispositive motions, and the proposed joint pretrial
8 order as described in the proposed timeline above.

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This is the Parties' first request for an extension of these deadlines.
DATED this 28th day of August 2018.

KAZEROUNI LAW GROUP, APC

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ORDER

IT IS HEREBY ORDERED that the Order, ECF No 10, is modified to extend the discovery deadlines as follows:

- (1) last date to disclose experts: **October 5, 2018**;
 - (2) last date to disclose rebuttal experts: **November 4, 2018**;
 - (3) last date to complete discovery: **December 4, 2018**;
 - (4) last date to file dispositive motions: **January 3, 2019**; and
 - (5) last date to file the proposed joint pretrial order: **February 5, 2019**.

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

Dated: 8/29/2018